

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

DENNIS HANSCOM, on behalf of himself  
and all others similarly situated,

Plaintiff,

vs.

NORDSEC LTD., NORDSEC B.V.,  
NORDVPN S.A., NORD SECURITY INC.,  
and TEFINCOM S.A. d/b/a NORDVPN,

Defendants.

**CASE NO. 3:24-CV-00277-KDB-DCK**

**DEFENDANTS' CONSENT MOTION FOR EXTENSION  
OF TIME TO FILE REPLY IN SUPPORT OF MOTION TO  
DISMISS AMENDED COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 6(b) and Local Rule 7.1, Defendants NordSec Ltd., Nordsec B.V., NordVPN S.A., Nord Security Inc., and Tefincom S.A. d/b/a NordVPN (collectively "Defendants"), by special appearance, move for an extension of time up to and including October 9, 2024, to file a reply in support of Defendants' motion to dismiss the amended class action complaint in this matter. In support, Defendants state as follows:

1. Plaintiff filed this lawsuit against Defendants on March 5, 2024. Dkt. 1.
2. Defendants filed two consent motions to extend the time to respond to the Complaint, which the Court granted. Dkt. 13, 16, 25, 30. Defendants filed their motion to dismiss the original complaint pursuant to Federal Rules of Civil Procedure 12(b)(2) and 12(b)(6) on July 3, 2024. Dkt. 44.
3. On July 16, 2024, Plaintiff filed a consent motion to extend its time to amend the complaint until July 31, 2024. Dkt. 48. The Court granted Plaintiff's consent motion the same day. Dkt. 49.

4. Plaintiff filed the amended complaint on July 31, 2024. Dkt. 50.
5. On August 2, 2024, Defendants filed a consent motion to extend their time to respond to the amended complaint to August 21, 2024. Dkt. 52. The Court granted Defendants' consent motion the same day. Dkt. 53.
6. On August 21, 2024, Defendants filed their motion to dismiss the amended complaint. Dkt. 54, 55.
7. On August 27, 2024, Plaintiff filed a consent motion to extend their time to respond to Defendants' motion to dismiss the amended complaint to September 18, 2024. Dkt. 57. On August 28, 2024, the Court granted Plaintiff's consent motion. Dkt. 58.
8. On September 18, 2024, Plaintiff filed his opposition to Defendants' motion to dismiss the amended complaint. Dkt. 59.
9. Defendants' current deadline to file a reply in support of Defendants' motion to dismiss the amended complaint is September 25, 2024. Defendants request a modest extension of that deadline, up to and including October 9, 2024, due to conflicts with other matters.
10. Defendants' request is not made for the improper purpose of undue delay. This is Defendants' first request for an extension to file a reply in support of its motion to dismiss the amended complaint.
11. Defendants have conferred with counsel for Plaintiff, and Plaintiff consents to the requested extension.

Accordingly, Defendants NordSec Ltd., Nordsec B.V., NordVPN S.A., Nord Security Inc., and Tefincom S.A. d/b/a NordVPN request that the Court grant this consent Motion extending Defendants' deadline to file a reply in support of Defendants' motion to dismiss the amended class action complaint up to and including October 9, 2024.

Dated: September 20, 2024

Respectfully submitted,

**McGUIREWOODS LLP**

By: /s/ Jodie Herrmann Lawson

Jodie Herrmann Lawson

NC State Bar No. 42900

Jessica L. O'Brien

NC State Bar No. 56679

201 N. Tryon Street, Suite 3000

Charlotte, NC 28202

Telephone: (704) 343-2329

Facsimile: (704) 444-8785

[jlawsen@mcguirewoods.com](mailto:jlawsen@mcguirewoods.com)

[jobrien@mcguirewoods.com](mailto:jobrien@mcguirewoods.com)

**FENWICK & WEST, LLP**

Jedediah Wakefield

Ethan Thomas

Samuel Sahagian

555 California Street, 12th Floor

San Francisco, CA 94104

Telephone: 415.875.2300

Facsimile: 650.938.5200

Email: [jwakefield@fenwick.com](mailto:jwakefield@fenwick.com)

[ethomas@fenwick.com](mailto:ethomas@fenwick.com)

[ssahagian@fenwick.com](mailto:ssahagian@fenwick.com)

Adam Gahtan

902 Broadway, 18<sup>th</sup> Floor

New York, NY 10010

Telephone: 212.430.2600

Facsimile: 650.938.5200

Email: [agahtan@fenwick.com](mailto:agahtan@fenwick.com)

*Counsel for Defendants NordVPN S.A., Nord Security  
Inc., NordSec Ltd, NordSec B.V., and Tefincom S.A.*

**CERTIFICATE OF SERVICE**

I certify that on September 20, 2024, I electronically filed this Motion with the Clerk of Court using the CM/ECF system, which automatically provides electronic notice to all counsel of record.

/s/ Jodie Herrmann Lawson

Jodie Herrmann Lawson  
NC State Bar No. 42900

*Counsel for Defendants NordVPN S.A., Nord Security Inc., NordSec Ltd, NordSec B.V., and Tefincom S.A.*